

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

COACH USA, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11258 (MFW)

(Jointly Administered)

Ref. Docket No. \_\_\_\_

**ORDER SHORTENING NOTICE AND OBJECTION PERIODS FOR,  
AND SCHEDULING AN EXPEDITED HEARING ON, THE DEBTORS' MOTION FOR  
ENTRY OF AN ORDER (A) APPROVING (I) THE DEBTORS' DESIGNATION OF  
THE STALKING HORSE BIDDER FOR CERTAIN OF THE DEBTORS' ASSETS AS  
SET FORTH IN THE STALKING HORSE AGREEMENT, (II) THE DEBTORS' ENTRY  
INTO THE STALKING HORSE AGREEMENT, AND  
(III) THE BID PROTECTIONS AND (B) GRANTING RELATED RELIEF**

Upon the *Motion to Shorten Notice and Objection Periods For, and Schedule an Expedited Hearing On, the Debtors' Motion for Entry of an Order (A) Approving (I) the Debtors' Designation of the Stalking Horse Bidder for Certain of the Debtors' Assets as Set forth in the Stalking Horse Agreement, (II) the Debtors' Entry into the Stalking Horse Agreement, and (III) the Bid Protections and (B) Granting Related Relief* (the "Motion to Shorten")<sup>2</sup> filed by the above-captioned debtors and debtors in possession (collectively, the "Debtors"); and this Court having reviewed the Motion to Shorten; and this Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334(b) and 157, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and this Court having found that venue of these cases and the Motion to Shorten in this

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/CoachUSA>. The Debtors' mailing address is 160 S Route 17 North, Paramus, NJ 07652.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion to Shorten.

district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that notice of the Motion to Shorten has been given as set forth in the Motion to Shorten and that such notice is adequate and no other or further notice need be given; and this Court having found and determined that the relief sought in the Motion to Shorten is in the best interests of the Debtors, their estates, their creditors, and all other parties in interest; and this Court having determined that the legal and factual basis set forth in the Motion to Shorten establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion to Shorten is GRANTED as set forth herein.
2. Approval of the Stalking Horse Motion will be considered at a hearing scheduled for July 16, 2024 at 2:00 p.m. (ET) (the “Hearing”).
3. Objections, if any, to the relief requested in the Stalking Horse Motion shall be either (i) filed on the docket of the Chapter 11 Cases in advance of the Hearing; or (ii) raised at the Hearing.
4. Notwithstanding the possible applicability of Bankruptcy Rules 6004(h), 6006(d), 7052, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion to Shorten.

6. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.